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**BEFORE THE
DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
WASHINGTON, D.C.**

DEPT. OF TRANSPORTATION
DOCKETS

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Notice of Alternative Policy Options for
Managing Capacity at LaGuardia
Airport and Proposed Extension of the
Lottery Allocation

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Docket FAA-2001-9852 —

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**PHASE ONE COMMENTS OF DELTA AIR LINES, INC.
AND THE DELTA CONNECTION CARRIERS**

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AND THE DELTA
CONNECTION CARRIERS
COMAIR, INC. AND
ATLANTIC SOUTHEAST
AIRLINES, INC.**

July 12, 2001

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**PHASE ONE COMMENTS OF DELTA AIR LINES, INC.
AND THE DELTA CONNECTION CARRIERS**

Delta Air Lines, Inc. and the Delta Connection carriers Comair, Inc., Atlantic Southeast Airlines, Inc., and Atlantic Coast Airlines (hereinafter jointly referred to as "Delta") respectfully submit the following comments on the FAA's Phase One proposal in response to the FAA's Notice and request for comments on the proposed extension of the lottery allocation at LaGuardia Airport ("LGA"). These comments respond only to the interim "Phase One" proposal in the FAA's notice. Delta will submit separate comments on the Phase Two proposals.¹

¹ Delta and the Delta Connection carriers are today filing an answer supporting the request of the Air Transport Association ("ATA") for a 180 day extension of the Phase Two comment period. Delta and the Delta Connection carriers strongly agree with the ATA that the economic, operational and legal issues raised by the Phase Two proposals are complex and that the interested parties will not have adequate time to fully develop these issues for the FAA in the currently-allotted

Delta supports the FAA's proposal to extend the current administrative lottery allocation of LGA AIR-21 slot exemptions until an appropriate longer term solution for LGA congestion is devised. Delta agrees with the FAA that a significant factor for consideration in any interim or long-term solution to the problems involving LGA congestion must always be the interest in avoiding schedule disruptions. Such disruptions impose severe burdens and costs on the carriers who serve LGA, and on the passengers and communities they serve, particularly on smaller communities with limited service to the airport. Delta therefore agrees with the FAA that maintenance of the current administrative allocation of AIR-21 slot exemptions pending the adoption of a longer term solution at LGA is essential to avoid further disruptions of critical service and competition between LGA and small and underserved communities.

Delta also agrees with the FAA's Notice to extend the current lottery approach beyond October 26, 2002 if a longer term solution is not implemented before that date.

In addition, Delta notes that according to the FAA's own operational and delay statistics, the congestion and delay problems at LGA have shown a marked improvement. Thus, despite increases in the level of operations at LGA between

comment period.

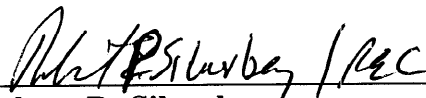
April 2000 (Pre-AIR 21) and April 2001 (Post AIR-21), LGA has experienced reductions in the number of monthly delays, average daily delays, percentage of operations delayed and average delay time. These data suggest that factors other than the lottery have contributed to the improved results. Therefore, Delta urges the FAA to monitor on a continuing basis system performance at LGA in order to determine whether to increase the hourly caps at LGA during this interim period. LGA is a valuable resource which should be utilized as efficiently as possible consistent with the need to balance demand for access with airport congestion. Any allocation of additional slot exemptions that become available due to increases in hourly caps should be made consistently with the objectives of AIR-21.

Respectfully submitted,



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